

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PAULA DISBERRY,

Plaintiff,

v.

EMPLOYEE RELATIONS COMMITTEE  
OF THE COLGATE-PALMOLIVE  
COMPANY, ALIGHT SOLUTIONS, LLC,  
AND THE BANK OF NEW YORK  
MELLON CORPORATION,

Defendants.

Case No. 22-CV-5778-CM-OTW

**THE EMPLOYEE RELATIONS COMMITTEE OF THE COLGATE-PALMOLIVE  
COMPANY’S NOTICE OF MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Employee Relations Committee of the Colgate-Palmolive Company (the “Committee”), by and through its undersigned counsel, respectfully requests that the Court grant summary judgment as to all claims in Plaintiff’s Amended Complaint (“Complaint”), Dkt. 77, against the Committee. As described in detail in Defendant’s accompanying Memorandum in Support of Its Motion for Summary Judgment, the undisputed facts show that the Committee did not breach its fiduciary duties.

In support of its Motion, Defendant relies upon its Memorandum in Support of Its Motion for Summary Judgment, the attached Statement of Material Facts on Motion for Summary Judgment, and the supporting Declaration of Patrick C. DiCarlo as well as all exhibits thereto.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's Motion for Summary Judgment, dismiss all remaining claims with prejudice as to the Committee, and award the Committee any other appropriate relief.

Dated: October 3, 2023

Respectfully Submitted,

/s/ Patrick C. DiCarlo

GROOM LAW GROUP, CHARTERED

Patrick C. DiCarlo

1701 Pennsylvania Ave., N.W.

Washington, D.C. 20006

202-857-0620 (phone)

202-659-4503 (fax)

PDicarlo@groom.com

*Attorneys for Defendant Employee Relations  
Committee of the Colgate-Palmolive Company*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 3, 2023, a copy of the foregoing was filed and served via ECF on all counsel of record.

Dated: October 3, 2023

Respectfully submitted,

/s/ Patrick C. DiCarlo